

FACT SHEET

DRAFT CLASS 3 PERMIT MODIFICATION TO ADD LIQUID STORAGE, NEW DEBRIS TREATMENT METHODS, AND INFORMATIONAL CHANGES TO THE EXISTING HMWA/RCRA STORAGE AND TREATMENT PERMIT FOR THE IDAHO NUCLEAR TECHNOLOGY AND ENGINEERING CENTER (INTEC) LOCATED AT THE IDAHO NATIONAL LABORATORY (INL) EPA ID NO. ID4890008952

This fact sheet sets forth the principal facts pertaining to a draft Class 3 Permit Modification Request the Idaho Department of Environmental Quality (DEQ) is proposing to approve. The request sets forth the applicable permit conditions the DEQ intends to require of the United States Department of Energy (DOE).

A. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to design specific administrative and operational requirements under which the Permittee will operate to comply with the Idaho Hazardous Waste Management Act (HWMA) of 1983, as amended, and regulations promulgated thereunder by the DEQ.

The requested modifications do not alter the ability of the Permittee to provide continued protection of human health and the environment.

DEQ reviewed, revised, and now proposes to approve the draft Class 3 Permit Modification.

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA 58.01.05.013 [40 CFR § 124.10(b)(1)] requires that the public be given forty five (45) calendar days to comment on a draft Class 3 Permit Modification Request (PMR) presented for approval under the HWMA. The comment period will begin on January 23, 2006, and will end at 5:00 p.m. on March 9, 2006. Any person interested in commenting must do so within this 45-calendar day comment period. Only strikethrough, highlighted portions of the permit are open for public comment.

All persons wishing to comment on the proposed modifications of the Partial Permit should submit comments in writing to:

*Mr. Robert Bullock
c/o Teri Gregory
Idaho Department of Environmental Quality
Waste Management and Remediation Division
1410 North Hilton
Boise, ID 83706-1255
(208) 373-0502*

Comments should include all reasonable available references, factual grounds, and supporting material. As a Class 3 Permit Modification, only those conditions to be modified are reopened for comment in this Draft Permit in accordance with IDAPA 58.01.05.013 [40 CFR § 124.5].

Opportunity for a public hearing may be provided if signed, written requests, in accordance with IDAPA 58.01.05.013 [40 CFR § 124.11], for a hearing are submitted personally or are addressed to the aforementioned and received at or before 5:00 p.m. March 9, 2006.

If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held. The decision on whether there is sufficient public interest in holding the hearing will be based on the receipt of written comments and requests for a public hearing.

When making the final determination regarding the approval of this draft Class 3 PMR, the DEQ will consider all written comments received during the public comment period, the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 et seq., and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

The HWMA/RCRA Storage and Treatment Permit, Vol. 18, allows the DOE to operate twenty (20) container storage units; eight (8) waste pile storage units; six (6) tank treatment units; three (3) container treatment units; and four (4) miscellaneous treatment units located in Building CPP-659/1659, and one (1) container storage unit located in Building CPP-666 at the INTEC.

The Class 3 PMR proposes the following additions/changes:

- Revise the permit to allow for containerized liquid storage (SO1) of hazardous and/or mixed waste in container storage areas of Building CPP-659 Rooms 205, 206, 207, 214, 215, 216, 218, 306, 308, 309, 323, 326, 415, 416, 417, 418, 419, 422, 423, 428, and CPP-1619;
- Revise the permit to add sizing, compaction, and repackaging (T04) as new debris treatment methods in CPP-659;
- Revise the permit to allow the addition of liquid absorbent (T04) to containerized wastes;
- Revise the permit to add the Crane Maintenance Area (CPP-659, Room 428) as a container storage (S01) unit;
- Revise the permit to include informational changes;
- Update the Part A Permit Application to incorporate the new EPA forms and include the revised information pertaining to this PMR.

D. PARTIAL PERMIT ORGANIZATION

The Permit is divided into seven (7) modules, two (2) appendices and six (6) tables:

<u>MODULE</u>	<u>TITLE</u>
I	STANDARD PERMIT CONDITIONS
II	GENERAL FACILITY CONDITIONS
III	CONTAINER STORAGE AND CONTAINER TREATMENT
IV	WASTE PILES
V	TANK SYSTEM STORAGE AND/OR TANK TREATMENT
VI	MISCELLANEOUS TREATMENT
VII	CORRECTIVE ACTION
APPENDIX A	RCRA FACILITY INVESTIGATION
APPENDIX B	CORRECTIVE MEASURES STUDY AND IMPLEMENTATION TABLES

<u>ATTACHMENT</u>	<u>TOPIC</u>
1	FACILITY DESCRIPTION
1a	FACILITY DESCRIPTION OF RMWSF AND HCRWSF
2	WASTE CHARACTERISTICS
3	PROCEDURES TO PREVENT HAZARDS, SECURITY
4	PROCEDURES TO PREVENT HAZARDS, INSPECTION SCHEDULES, FORMS AND PROCEDURES
5	PERSONNEL TRAINING

- 6 PROCEDURES TO PREVENT HAZARDS,
COMMUNICATIONS, EMERGENCY EQUIPMENT, 100-
YEAR FLOOD PLAIN ANALYSIS
- 7 PREPAREDNESS, PREVENTION AND CONTINGENCY
PLAN
- 8 CLOSURE AND POST-CLOSURE REQUIREMENTS
- 8a CLOSURE AND POST-CLOSURE REQUIREMENTS FOR
RMWSF
- 9 WASTE PILE DESIGN EXEMPTION
- 10 PERMIT REVISION LOG